

CAUSE NO. DC-20-01121**ALAN SEVADJIAN,****Plaintiff,****v.****TEXAS DEPARTMENT OF
MOTOR VEHICLES,****Defendant.*****CONSOLIDATED WITH*****FRANCK RADENNE,
Plaintiff,****v.****DUNTOV MOTOR COMPANY, LLC,
ALAN SEVADJIAN, AND EDWARD
SEVADJIAN,****Defendants.****14TH JUDICIAL DISTRICT COURT****OF THE STATE OF TEXAS****IN DALLAS COUNTY**

PLAINTIFF'S MOTION TO EXCEED PAGE LIMIT

Plaintiff Franck Radenne ("Plaintiff" or "Radenne") files this Motion to Exceed Page Limit for attachments to his Motion for Summary Judgment and respectfully states as follows:

Plaintiff intends to move for traditional and no evidence summary judgment in a pleading filed contemporaneously herewith. Specifically, Radenne will move for traditional summary judgment on five issues. Plaintiff will also move for no evidence summary judgment on eighteen issues.

Pursuant to the Dallas County General Order dated April 6, 2020, Plaintiff's Traditional and No Evidence Motion for Partial Summary Judgment ("MSJ") satisfies the local rule and is limited to twenty-five pages. However, the Appendix in support of the MSJ containing Plaintiff's



summary judgment evidence, which is also limited by local rule to twenty-five pages, is fifty-seven (57) pages.

Plaintiff's MSJ involves complex arguments related to fraud, violations of the Texas Deceptive Trade Practices Act, and other similar claims. These arguments require the introduction of eight (8) emails, fourteen (14) pages excepted from the deposition of Defendant Alan Sevadjan, and other relevant evidence (collectively, the "Evidence"). The Evidence does not include extraneous pages or irrelevant information.¹

Plaintiff's necessary Evidence exceeds the page limit set by the Dallas County General Order dated April 6, 2020 by thirty-two (32) pages for a total of fifty-seven (57) pages. Radenne requires additional pages for his appendix to adequately present the evidence supporting his MSJ to the Court.

For these reasons, Plaintiff respectfully requests that the Court grant this Motion to Exceed Page Limit and permit him to file an Appendix to his MSJ that contains an appendix up to fifty-seven (57) pages in length.

¹ A complete copy of the Evidence will be made available upon the Court's or opposing counsel's request.

Dated: October 23, 2020

Respectfully submitted,

/s/ Darla J. Gabbitas

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**ATTORNEYS FOR PLAINTIFF FRANCK
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all counsel of record in accordance with the Texas Rules of Civil Procedure on October 23, 2020.

/s/ Darla J. Gabbitas

Darla J. Gabbitas

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